

## **EXHIBIT A**

**Baker & Hostetler LLP**

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David J. Sheehan, Esq.

Karin S. Jenson, Esq.

Kathryn M. Zunno, Esq.

Esterina Giuliani, Esq.

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

COHMAD SECURITIES CORPORATION, *et. al.*,

Defendants.

Adv. Pro. No. 09-01305 (SMB)

**DECLARATION OF KARIN S. JENSON IN SUPPORT OF THE  
TRUSTEE'S MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANT  
JONATHAN GREENBERG'S MOTION FOR A PROTECTIVE ORDER AND TO  
QUASH TWO SUBPOENAS UNDER FED. R. CIV. P. 45**

I, Karin S. Jenson, Esq., hereby declare as follows:

1. I am a partner at the law firm of Baker & Hostetler LLP, counsel to Irving H. Picard (the "Trustee"), trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC ("BLMIS"), under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et. seq.*, and the substantively consolidated estate of Bernard L. Madoff ("Madoff"), individually.
2. I have personal knowledge of the matters stated in this Declaration.
3. I submit this Declaration to place before the Court a true and correct copy of correspondence relevant to the Trustee's Memorandum of Law in Opposition to Defendant Jonathan Greenberg's Motion for a Protective Order and to Quash Two Subpoenas under Fed. R. Civ. P. 45 ("the Motion").
4. Attached hereto as Exhibit 1 is a copy of a June 17, 2015 email and letter from Ms. Jessie Kuhn, an attorney at Baker & Hostetler LLP, to Greenberg's counsel and other defense counsel and parties in this adversary proceeding providing advance notice of the Trustee's Rule 45 subpoenas to Citibank, N.A. and JPMorgan Chase, N.A, and other banks.
5. The attachment to Ms. Kuhn's letter, which contains the subpoenas to be served after June 17, 2015, is not included in Exhibit 1 because of its length. The only subpoenas at issue in the Motion are attached to the Declaration of Ernest Edward Badway, Esq. in Support of

Defendant's Motion for a Protective Order and to Quash the Subpoenas as Exhibits A and B.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: August 11, 2015

By: /s/ Karin S. Jenson

Karin S. Jenson  
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New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
Email: kjenson@bakerlaw.com

# **EXHIBIT 1**

**Schutte, Elizabeth M.**

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**From:** Kuhn, Jessie A.  
**Sent:** Wednesday, June 17, 2015 5:57 PM  
**To:** sparadise@velaw.com; cthau@velaw.com; mantos-fallon@velaw.com;  
mblount@blountlavin.com; jlavin@blountlavin.com; EBadway@foxrothschild.com;  
fhoffinger@hsrlaw.com; jhoffinger@hsrlaw.com; jmiller@westermanllp.com;  
rgabriele@westermanllp.com; blanger@mclaughlinstern.com;  
dsass@mclaughlinstern.com; dkatsky@katskykorins.com; rabrams@katskykorins.com;  
j.delaire@yahoo.com; vdohan@dlkny.com; jkeenana@mccanliss.com;  
sschlesinger@jaspanllp.com; sscott@jaspanllp.com  
**Cc:** Zunno, Kathryn M.; Giuliani, Esterina; Jenson, Karin Scholz  
**Subject:** Picard v. Cohmad Securities Corporation, et al.; Adv. Pro. No. 9-01305  
**Attachments:** 20150617175252360.pdf; Cohmad - Subpoenas(1).pdf

Counsel and Ms. Delaire,

Please find attached correspondence in connection with the above-referenced adversary proceeding.

Best,

Jessie

**My Bio   Web site   vCard**

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Jessie A. Kuhn  
direct dial: 212.847.2833  
jkuhn@bakerlaw.com

June 17, 2015

**VIA E-MAIL AND FEDERAL EXPRESS**

Re: *Adv. Pro. No. 09-01305 (SMB); Irving H. Picard, Trustee for the liquidation of Bernard L. Madoff Investment Securities LLC v. Cohmad Securities Corporation, et al.*, in the United States Bankruptcy Court for the Southern District of New York.

Dear Counsel and *Pro Se* Defendants:

Please find attached Rule 45 subpoenas that the Trustee intends to serve on the following entities in connection with the above-referenced adversary proceeding:

- Bank of America, N.A.
- BB&T/Branch Banking & Trust Co.
- The Bank of New York Mellon
- Cape Bank
- Citibank, N.A.
- Clariden Bank
- Deutsche Bank Trust Company Americas
- Dreyfus Sons & Co. Limited
- Fidelity Investments
- Fiserv, Inc.
- HSBC
- JPMorgan Chase, N.A.
- La Roche & Co. Bankers
- Les Fils Dreyfus & CIE SA Banquiers
- Morgan Stanley Smith Barney
- National Financial Services LLC
- PNC Bank
- Provident Bank
- Regions Bank
- Regions Financial Corporation
- State Street Bank and Trust Company
- SunTrust Bank

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Denver  
Houston Los Angeles New York Orlando Philadelphia Seattle Washington, DC

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- Wells Fargo Bank, N.A.

The subpoenas will be served on June 18, 2015.

Sincerely,



Jessie A. Kuhn

cc: Kathryn M. Zunno, Esq. (via e-mail)  
Esterina Giuliani, Esq. (via e-mail)  
Karin S. Jenson, Esq. (via e-mail)  
Robert A. Abrams, Esq. (via e-mail)  
Ernest E. Badway, Esq. (via e-mail)  
Mark Blount, Esq. (via e-mail)  
Jane M. Delaire (pro se) (via e-mail)  
Vivian R. Drohan, Esq. (via e-mail)  
Marisa Antos-Fallon, Esq. (via e-mail)  
Richard J. Gabriele, Esq. (via e-mail)  
Fran Hoffinger, Esq. (via e-mail)  
Jack Hoffinger, Esq. (via e-mail)  
David L. Katsky, Esq. (via e-mail)  
Joseph F. Keenan, Esq. (via e-mail)  
Edward H. Kohlschreiber, individually and on behalf of Edward H Kohlschreiber Sr Rev  
Mgt Trust (pro se) (via Federal Express)  
Bruce A. Langer, Esq. (via e-mail)  
John Lavin, Esq. (via e-mail)  
Jeffrey A. Miller, Esq. (via e-mail)  
Steven R. Paradise, Esq. (via e-mail)  
David W. Sass, Esq. (via e-mail)  
Steven R. Schlesinger, Esq. (via e-mail)  
Shannon A. Scott, Esq. (via e-mail)  
Lauren Talan, Esq. (via e-mail)  
Clifford Thau, Esq. (via e-mail)



[Voluminous attachment omitted]